

FILED

UNITED STATES DISTRICT COURT
Eastern District of Virginia
Alexandria Division

2017 MAY 15 P 1:17

BRIAN C. DAVISON

Plaintiff,

v.

LOUDOUN COUNTY BOARD OF
SUPERVISORS, ET. AL.,

Defendants.

ERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Case No.:
1:16-CV-932
(JCC/IDD)

PLAINTIFF'S REVISED FINAL PRETRIAL DISCLOSURES

Pursuant to This Court's Summary Judgment ruling, Plaintiff Brian C. Davison hereby designates the following revised pretrial disclosures.

I. Name of Each Witness Expected to be Presented: F.R.C.P. 26(a)(3)(A)(I):

- ① ✓ 6. Brian Davison – Plaintiff 5/16/2017
- ② ✓ 14. Phyllis Randall - Loudoun County Supervisor, Chair 5/16/2017
- ③ ✓ 15. Jeanine Arnett, Chief of Staff, Office of the Loudoun County BOS Chair 5/16/2017
- 18. Any witness identified by the Defendants
- 19. Any witness necessary for impeachment or rebuttal

II. Name of Each Witness Who May Be Called: F.R.C.P. 26(a)(3)(A)(ii):

- 1. Plaintiff reserves the right to call any witness identified by the Defendant to whom no objection is noted by the Plaintiff.

III. Identification of Each Document or Other Exhibit: F.R.C.P. 26(a)(3)(A)(iii):

Exhibit #	Exhibit Description	
✓ 1	Facebook - Virginia SGP Feb 2, 2016 post	B.DAVISON 5/16/2017
✓ 2	Feb 3, 2016 LEAP town hall video (CD-ROM)	B.DAVISON 5/16/2017
(A) ✓ 3	Feb 3, 2016 bcdavison tweet 1955	B.DAVISON 5/16/2017
✓ 4	Feb 3, 2016 bcdavison tweet 2034	B.DAVISON 5/16/2017
(A) ✓ 5	Facebook - LEAP Feb 3, 2016 post	B.DAVISON 5/16/2017
✓ 6	Facebook - Virginia SGP Feb 4, 2016 @0003 post	B.DAVISON 5/16/2017
✓ 7	Facebook - Buona Feb 4, 2016 post	B.DAVISON 5/16/2017
(A) ✓ 8	Facebook - Chair Randall Feb 4, 2016 @0854 post	B.DAVISON 5/16/2017
✓ 9	Facebook - Chair Randall Feb 6, 2016 @1147 post	
✓ 10	Loudoun Times-Mirror forum Feb 4, 2016 @1317 comment	B.DAVISON 5/16/2017
11	Facebook - Chair Randall Apr 20, 2016 post	
12	Email - Rogers Feb 4, 2016 @0017	
13	INT-05 Use of Social Media Policy	
(A) ✓ 14	COMM-01 Media Relations Policy	5/16/2017 P.RANDALL
15	Facebook - Chair Randall Dec 14, 2016 pages	
16	Facebook - LTM Randall responds Oct 1, 2016 comment	
(A) ✓ 17-31	Chair Phyllis J Randall Newsletters	P.RANDALL 5/16/2017
32	Facebook pages of 7 BOS Supervisors	
{ (A) 33	Facebook - Blocking instructions	B.DAVISON 5/16/2017
(A) 34	Facebook - Ban Users instructions	
(A) 35	Facebook - Manage comments instructions	
(A) 36	Facebook - Hide comment instructions	
(A) 37	Facebook - Report profiles	
(A) 38	Facebook - Page basics	
(A) 39	Facebook - Page roles	
70	Barbour email to Facebook Jul 25, 2016	
71	Defendant Randall's Interrogatory Answers	
72	Defendant Loudoun BOS' Interrogatory Answers	
73-74	<placeholder>	
✓ 75	New Loudoun County social media comment policy Nov 22, 2016	B.DAVISON 5/16/2017
76	Randall newsletter on commission on women	
77	Barbour email to Plowman April 13, 2016	
78	Facebook-Letourneau FY18 budget, Feb 22, 2017 post	
79	<placeholder>	
81	Facebook-LCAS-post-Mar 18, 2016	

IT'S EX-35
NOT ORIGINALLY
ADMITTED
BY THE COURT

87-90	<placeholder>
(A) ✓ 92	Special Prosecutor Conflict of Interest opinion
(A) ✓ 93	Chair Phyllis J Randall Facebook page admins P. RANDALL 5/16/2017
(A) ✓ 94	Friends of Phyllis J. Randall page P. RANDALL 5/16/17
95	Phyllis Randall Profile
101-199	Screenshots of individual posts on the "Chair Phyllis J. Randall" page from its inception on December 30, 2015 until the present which are nearly entirely contained in Exhibit 15 above but individually presented for easier reference P. RANDALL 5/16/2017
	Plaintiff reserves the right to identify and introduce at trial as additional exhibits any document produced by the Defendants in their discovery responses.
	Any exhibit identified by the Defendants to which no objection is noted by the Plaintiff.
	Plaintiff reserves the right to present additional documents, including screenshots of Defendant's Facebook pages, in rebuttal to Defendants' testimony or evidence.

- ✓ IT EX 224 - REBUTIAL/IMPEACHMENT EXHIBIT - P. RANDALL 5/16/2017
 (A) ✓ IT EX 112 - MARCH 17 POST - P. RANDALL 5/16/2017
 (A) ✓ IT EX 213 - REDSKINS LONDON POST - OCT 8 - P. RANDALL 5/16/2017
 (A) ✓ IT EX 215 - LOUDOUN TRIBUNE POST - SEP 13 - P. RANDALL 5/16/2017

Dated: 15 May 2017

Respectfully submitted,

(A) ✓ IT EX 231 - EMAIL P. RANDALL TO B.DAVISON - P. RANDALL 5/16/2017

B C D

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- (A) ✓ IT EX 221 - FRIENDS OF RANDALL PAGE - P. RANDALL 5/16/2017
 (A) ✓ IT EX 219 - JAN. 24, 2016 POST - P. RANDALL 5/16/2017
 ✓ IT EX 201 - - P. RANDALL 5/16/2017
 ✓ IT EX 230 - AFFIDAVIT/DECLARATION - P. RANDALL 5/16/2017

IT'S EX.201
 NOT ORALLY ADMITTED - BUT NO OBJ BY A
 BY THE COURT